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**UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA  
 SAN FRANCISCO DIVISION**

In re CATHODE RAY TUBE (CRT)  
 ANTITRUST LITIGATION

Master Case No. 3:07-cv-05944-SC

MDL No. 1917

This Document Relates to:

Individual Case No. 3:14-cv-02510

*ViewSonic Corporation v. Chunghwa Picture Tubes, Ltd., et al.*, No. 3:14-cv-02510

**DECLARATION OF ADAM C. HEMLOCK IN SUPPORT OF THE PANASONIC DEFENDANTS' ADMINISTRATIVE MOTION TO FILE UNDER SEAL PURSUANT TO CIVIL LOCAL RULE 79-5(d) AND 7-11**

1 I, Adam C. Hemlock, hereby declare as follows:

2 1. I am an attorney with Weil, Gotshal & Manges LLP, counsel for Defendants Panasonic  
3 Corporation, Panasonic Corporation of North America, and MT Picture Display Co., Ltd.  
4 (collectively, the “Panasonic Defendants”) in these actions. I am a member of the bar of the State of  
5 New York and I am admitted to practice before this Court *pro hac vice*.

6 2. I submit this Declaration in support of the Panasonic Defendants’ Administrative Motion to  
7 File Documents Under Seal Pursuant to Civil Local Rules 79-5(d) and 7-11. I have personal  
8 knowledge of the facts stated herein and, if called as a witness, I could and would competently  
9 testify thereto.

10 3. On June 18, 2008, the Court approved a “Stipulated Protective Order” in this matter (Dkt.  
11 No. 306) (the “Protective Order”).

12 4. Pursuant to the Protective Order and Local Civil Rules 7-11 and 79-5(d), the Panasonic  
13 Defendants seek to seal the following concurrently filed document: the highlighted portions of the  
14 Panasonic Defendants’ Opposition to Plaintiff ViewSonic Corporation’s Motion for Leave to File  
15 Surreply.

16 5. The highlighted portions of the Panasonic Defendants’ Opposition to Plaintiff ViewSonic  
17 Corporation’s Motion for Leave to File Surreply reference confidential information contained in the  
18 OEM supply agreement previously sealed pursuant to the Order Granting the Panasonic Defendants’  
19 Administrative Motion to File Under Seal, dated September 5, 2014 (Dkt. 2800). Specifically,  
20 portions of pages 1, 2, 3, and 4 of the Panasonic Defendants’ Opposition to Plaintiff ViewSonic  
21 Corporation’s Motion for Leave to File Surreply contain such confidential information.

22 6. The Panasonic Defendants seek to submit the material referenced herein under seal in good  
23 faith in order to comply with the Protective Order in this action and the applicable Local Rules.  
24 Because the information in the materials that the Panasonic Defendants seek to submit under seal has  
25 been designated as “Highly Confidential” by ViewSonic Corporation (the “Designating Party”), the  
26 Panasonic Defendants are filing the accompanying Motion to File Under Seal, and will be prepared  
27 to file an unredacted version of the Panasonic Defendants’ Opposition to Plaintiff ViewSonic  
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1 Corporation's Motion for Leave to File Surreply in the public record "[i]f the Designating Party does  
2 not file a responsive declaration as required by subsection 79-5(e)(1) and the Administrative Motion  
3 to File Under Seal is denied." Civ. L.R. 79-5(e)(2).

4 I declare under penalty of perjury under the laws of the United States of America that the  
5 foregoing is true and correct.

6  
7 Executed on October 16, 2014 at Tokyo, Japan.

8 By: /s/ Adam C. Hemlock  
9 ADAM C. HEMLOCK  
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